

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 7

TRANSCARE CORPORATION, et al.

Case No.: 16-10407 (SMB)
(Jointly Administered)

Debtors.

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SALVATORE LAMONICA, as Chapter 7

Adv. Proc. No. 18-1021

Trustee for the Estates of TransCare

Corporation, et al.,

Plaintiff,

v.

LYNN TILTON, PATRIARCH
PARTNERS AGENCY SERVICES, LLC,
PATRIARCH PARTNERS, LLC,
PATRIARCH PARTNERS MANAGEMENT
GROUP, LLC, ARK II CLO 2001-1,
LIMITED, ARK INVESTMENT PARTNERS
II, L.P., LD INVESTMENTS, LLC,
PATRIARCH PARTNERS II, LLC,
PATRIARCH PARTNERS III, LLC,
PATRIARCH PARTNERS VIII, LLC,
PATRIARCH PARTNERS XIV, LLC,
PATRIARCH PARTNERS XV, LLC,
TRANSCENDENCE TRANSIT, INC., and
TRANSCENDENCE TRANSIT II, INC.

Defendants.

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STIPULATION AND SCHEDULING ORDER

WHEREAS, counsel for Plaintiff Salvatore LaMonica as Chapter 7 Trustee (the "Trustee")
of the jointly-administered estates of TransCare Corporation, TransCare New York, Inc.,
TransCare ML, Inc., TC Ambulance Group, Inc., TransCare Management Services, Inc., TCBA

Ambulance, Inc., TC Billing and Services Corporation, TransCare Westchester, Inc., TransCare Maryland, Inc., TC Ambulance North, Inc., TransCare Harford County, Inc., TransCare Pennsylvania, Inc., TC Ambulance Corporation, and TC Hudson Valley Ambulance Corp. (collectively, “TransCare”), and counsel for Defendants Lynn Tilton, Patriarch Partners Agency Services, LLC, Patriarch Partners, LLC, Patriarch Partners Management Group, LLC, Ark II CLO 2001-1, Limited, Ark Investment Partners II, L.P., LD Investments, LLC, Patriarch Partners II, LLC, Patriarch Partners III, LLC, Patriarch Partners VIII, LLC, Patriarch Partners XIV, LLC, Patriarch Partners XV, LLC, Transcendence Transit, Inc., and Transcendence Transit II, Inc. (collectively, “Defendants” and, together with the Trustee, the “Parties”)) conferred to develop a proposed scheduling order for this matter;

WHEREAS, on April 17, 2018, the Court held a pre-trial status conference in this matter and on that date directed the Parties to submit a Stipulation and Proposed Scheduling Order;

IT IS HEREBY ORDERED AS FOLLOWS:

1. Deadline for Fed. R. Civ. P. 26(a)(1) Disclosures: May 14, 2018.
2. Completion of Fact Discovery: October 26, 2018.
3. Deadline for Fed. R. Civ. P. 26(a)(2) Disclosures: November 30, 2018.
4. Deadline for Designating Any Rebuttal Experts and Service of Any Rebuttal Expert Reports: January 7, 2019.
5. Completion of Expert Discovery: February 6, 2019.
6. Deadline to Request Pre-Motion Conference for Any Dispositive Motions: March 8, 2019.
7. If No Dispositive Motions, Deadline to Submit Agreed Pre-Trial Order: March 29, 2019.
8. If No Dispositive Motions, Final Pre-Trial Conference: April 11, 2019.

Dated: New York, New York
April 20, 2018

STORCH AMINI PC

PROSKAUER ROSE LLP

/s/ Avery Samet
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Attorneys for Trustee

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Attorneys for Defendants

IT IS SO ORDERED:

Dated: April 23, 2018
New York, New York

/s/ STUART M. BERNSTEIN

United States Bankruptcy Judge